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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, MARIELA
GONZÁLEZ, FREDDY JOSE ARAPE RIVAS,
M.H., CECILIA DANIELA GONZÁLEZ
HERRERA, ALBA CECILIA PURICA
HERNÁNDEZ, E.R., HENDRINA VIVAS
CASTILLO, A.C.A., SHERIKA BLANC, VILES
DORSAINVIL, and G.S.,

Plaintiffs,

vs.

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security, UNITED
STATES DEPARTMENT OF HOMELAND
SECURITY, and UNITED STATES OF
AMERICA,

Defendants.

Case No. 3:25-cv-01766-EMC

**DECLARATION OF JESSICA KARP
BANSAL IN SUPPORT OF PLAINTIFFS'
MOTION FOR ORDER SHORTENING
TIME AND SETTING SCHEDULE**

1 Additional Counsel for Plaintiffs

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1 I, Jessica Karp Bansal, declare:

2 1. I am an attorney at law duly licensed and entitled to practice in the State of
3 California. I am an attorney with the National Day Laborer Organizing Network and counsel of
4 record in this action. I have personal knowledge of the following facts and, if called as a witness, I
5 could and would testify competently as follows.

6 2. I file this declaration in support of Plaintiffs' Administrative Motion for Order
7 Shortening Time and Setting Schedule re: Plaintiffs' Motion for Compliance with Court Order [ECF
8 162] ("Motion to Shorten Time").

9 3. On Thursday, June 12, 2025, I emailed counsel for Defendants regarding inaccuracies
10 on USCIS's webpage for Venezuela's TPS designation that rendered the webpage inconsistent with
11 this Court's May 30, 2025 Order (ECF 162). Counsel for Defendants did not respond.

12 4. Today, June 17, 2025, I again emailed counsel for Defendants and requested
13 Defendants' position on Plaintiffs' intended Motion to Shorten Time. Defendants' counsel stated,
14 with regard to the inaccuracies on the webpage, that they are checking on this issue, and that
15 Defendants would oppose any motion to shorten time.

16 I declare under penalty of perjury that the foregoing is true and correct, and that this
17 declaration was executed in Claremont, California this 17th day of June, 2025.

18 /s/Jessica Karp Bansal

19 Jessica Karp Bansal
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